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January 26, 2021

**By ECF**

The Honorable Vernon S. Broderick  
United States District Court, Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: C.Q. v. Estate of David Rockefeller, et al.,  
Civ. No. 20-cv-02205-VSB

Dear Judge Broderick:

We represent defendants David Rockefeller, Jr., Richard E. Salomon, and James S. Sligar, as the Executors of the Estate of David Rockefeller, and Margaret Dulany Rockefeller (collectively, "Defendants") in the referenced matter. Pursuant to Your Honor's Individual Rules and Practices in Civil Cases Section 4.I, we write to request that Your Honor "so-order" the parties' stipulation and [proposed] order (the "Stipulation") setting forth an amended briefing schedule on Defendants' motion to dismiss the first amended complaint. In accordance with the Court's ECF Rules and Instructions, the Stipulation has been electronically filed as ECF No. 33.

Under the original briefing schedule (ECF No. 32), Defendants' motion to dismiss is due January 29, 2021. The parties, however, have agreed to a revised briefing schedule, as set forth in the Stipulation, providing for a short, fourteen day extension of all deadlines to accommodate unanticipated obligations in the undersigned's schedule. Under this revised briefing schedule, Defendants' motion is due February 12, 2021, plaintiff's opposition is due March 12, 2021, and Defendants' reply is due March 31, 2021.

No party has made a prior request to adjourn the briefing schedule set forth in ECF No. 32. The parties jointly request that the Court "so-order" the Stipulation.

Thank you for your consideration.

Hon. Vernon S. Broderick  
January 26, 2021

Respectfully,



Michael C. Lynch

cc: Danielle George, Esq. (via ECF)